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7	Attorneys for Plaintiff WIND OF TRADE LLC		
8	UNITED STATES DISTRICT COURT		
9	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
10	TOR THE NORTHERN DISTRICT OF CALIFORNIA		
11	WIND OF TRADE LLC, a Nevada limited	Case No. CV 07 06280 MMC	
12	liability company,	DEOLIECT FOR EMPRY OF	
13	Plaintiff,	REQUEST FOR ENTRY OF DEFAULT	
14	V.		
15	MOSTAG INTERNATIONAL, INC., a Pennsylvania corporation,		
16	Defendant.		
17			
18	TO THE CLERK OF THE ABOVE-ENTITLED COURT:		
19	Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, plaintiff Wind of Trade LLC		
20	("Wind of Trade"), hereby requests that the Clerk of the above-captioned Court enter default in this		
21	matter against defendant Mostag International, Inc. ("Mostag") on the grounds that said defendant has		
22	failed to appear or otherwise respond to the Complaint within the time prescribed by the Federal Rules		
23	of Civil Procedure.		
24	Service of the Complaint on Mostag at 1025 Washington Avenue, Croydon, Pennsylvania		
25	19021, was complete on December 13, 2007, (see Exhibit A to Declaration of Marc M. Gorelnik in		
26	Support of Request for Entry of Default ("Gorelnik Decl."). Mostag's Answer or other response to the		
27	Complaint was due January 2, 2008. No Answer or other response has been filed or served by		

28 defendant Mostag.

1 Defendant Mostag has not responded to the Complaint. Defendant Mostag was given prior 2 notice of plaintiff's intent to seek default, Gorelnik Decl., ¶ 4, but defendant has not responded. 3 Accordingly, plaintiff Wind of Trade seeks entry of the Clerk's default of defendant as to the Complaint. 4 Subsequent to the Clerk's entry of default, plaintiff intends to seek entry of default judgment. 5 DATED: January 14, 2008 Respectfully submitted, 6 TOWNSEND AND TOWNSEND AND CREW LLP 7 8 By: /s/Marc M. Gorelnik 9 Two Embarcadero Center, 8th Floor San Francisco, CA 94111 10 Tel: (415) 576-0200 Fax: (415) 576-0300 11 Attorneys for Plaintiff WIND OF TRADE LLC 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

1	PROOF OF SERVICE	
2	I am over the age of eighteen years and not a party to this action. My business address is Two	
3	Embarcadero Center, 8th Floor, San Francisco, California 94111.	
4	On January 14, 2008, I served a copy of the foregoing document:	
5	REQUEST FOR ENTRY OF DEFAULT	
6		
7	correspondence for mailing with the United States Postal Services. I placed a true copy thereof to which was attached a copy of this document(s) in a sealed envelope(s) with postage thereon fully prepaid addressed as listed below. The envelope(s) will be deposited with the United States Postal Service on this day in the ordinary course of business in San Francisco, California, following ordinary business practices.	
8		
9		
10	(X) (VIA FACSIMILE) I caused such document(s) to be delivered by facsimile to the facsimile number(s) listed below.	
11		
12	Mostag International 1025 A Washington Avenue	
13 Croydon, PA 19021	Croydon, PA 19021 Facsimile: (215) 781-6606	
14		
15	I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. EXECUTED on January 14, 2008 at San Francisco, California	
16		
17		
18		
19	/s/	
20	Billie Raney	
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